UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS
SPRINGFIELD DIVISION

CLAYTON RICHARD GORDON,   )
GUSTAVO RIBEIRO FERREIRA,   )
VALBOURN SAHIDD LAWES,   )
NHAN PHUNG VU,   )
CESAR CHAVARRIA RESTREPO   )
on behalf of themselves   )
and others similarly situated,   )
)
             Plaintiffs-Petitioners,   )
)
       v.   )   Civil Action No.
)   3:13-cv-30146-MAP
ELAINE C. DUKE,   )
Acting Secretary, U.S. Department of   )
Homeland Security, et al.   )
)
             Defendants-Respondents.   )

[PROPOSED] SUPPLEMENTAL PROTECTIVE ORDER

Respondents have been ordered to produce certain records containing identifying information which relates to class members who are not named plaintiffs in this case. Respondents previously agreed to produce to class counsel unredacted information relating to class members as ordered by the Court, subject to the Amended Protective Order entered by the Court on May 9, 2017 (ECF No. 202) ("Protective Order"). Since that date, Respondents have agreed to produce additional information subject to the disclosure rules set forth in the Protective Order. This information includes information covered by 8 U.S.C. §§ 1186A(c)(4), 1254a(c)(6), 1304(b), 22 U.S.C. § 7105(c)(1)(C); 8 C.F.R. §§ 214.11(e), 214.14(e), 216.5(e)(3)(viii), 236.6, 244.16, 1003.27(b)-(d), and 1003.46.

WHEREFORE, at the request of class counsel and counsel for Respondents ("the Parties"),

IT IS HEREBY ORDERED that in accordance with the terms of the Protective Order, Respondents are authorized to release to class counsel, to the Court, and to Court personnel in this case information otherwise covered by the following provisions: 8 U.S.C. §§ 1186A(c)(4), 1254a(c)(6), 1304(b), 22 U.S.C. § 7105(c)(1)(C); 8 C.F.R. §§ 214.11(e), 214.14(e); 216.5(e)(3)(viii), 236.6, 244.16, 1003.27(b)-(d), and 1003.46. Such disclosure is subject to the conditions set forth in the Protective Order. Nothing in this Order shall restrict the disclosure of any information previously authorized to be disclosed under the Protective Order.

Dated: October 12 , 2017

The Honorable Michael A. Ponsor
United States District Judge